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Attorneys for Plaintiff FLIR Systems, Inc.

**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**FLIR SYSTEMS, INC.**, an Oregon  
corporation,  
Plaintiff,

vs.

**THOMAS L. GAMBARO**, an individual  
d/b/a **PATENT ENFORCEMENT**  
**COMPANY; MOTIONLESS**  
**KEYBOARD COMPANY**, an Oregon  
corporation.  
Defendants.

Civil No.: 3:10-cv-00231-BR

**DECLARATION OF FAROOQ A.**  
**TAYAB IN SUPPORT OF**  
**PLAINTIFF'S CONCISE**  
**STATEMENT OF MATERIAL**  
**FACTS IN SUPPORT OF**  
**PLAINTIFF'S MOTION FOR**  
**PARTIAL SUMMARY JUDGMENT**

I, FAROOQ A. TAYAB, hereby declare as follows:

1. I am an attorney at Bickel & Brewer, which is counsel for Plaintiff FLIR Systems, Inc. ("FLIR") in the above-captioned action. I am one of the attorneys primarily responsible for the representation of FLIR in this action. All statements in this declaration are within my personal knowledge and I make this declaration in support of FLIR's Concise Statement of Material Facts in Support of Plaintiff's Motion for Partial Summary Judgment.

2. A true and correct copy of an email and its attachment from Thom Gambaro to William Brewer III, dated June 22, 2010, is attached hereto as Exhibit 1 ("Gambaro Email to Brewer"). Mr. Gambaro also copied me on this email.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16<sup>th</sup> day of September, 2010 in Dallas, Texas.

By:   
FAROOQ A. TAYAB

(7/7/2010) Kyle Witherspoon - Revised assignment

Page 1

**From:** Thom Gambaro <thom.gambaro@gmail.com>  
**To:** <wab@bickelbrewer.com>  
**CC:** Farooq Tayab <FAT@bickelbrewer.com>, Bill Powell <Bill.Powell@flir.com>, ...  
**Date:** 6/22/2010 3:29 AM  
**Subject:** Revised assignment  
**Attachments:** USPTO Assignments on the Web.pdf; Part.002

Mr. Brewer,

Attached is the PTO assignment of U.S. Patent No. 5,332,322 revised to be assigned to PATENT ENFORCEMENT COMPANY from MOTIONLESS KEYBOARD COMPANY. I trust this handles your concerns on the actual party in this case that is now PATENT ENFORCEMENT COMPANY.

This should also clarify that the party in this case is no longer MOTIONLESS KEYBOARD COMPANY.

Best,

Thom L Gambaro  
PATENT ENFORCEMENT COMPANY  
P O. Box 14741  
Portland, OR 97293-0741  
503-544-0589 mobile

--- Scanned by eMail Protection Services  
<http://www.harding-group.com/eps.html> ---

USPTO Assignments on the Web

6/22/10 12:54 AM



USPTO Assignments on the Web

Assignments on the Web > **Patent Query****Patent Assignment Assignee Details**

***NOTE: Results display only for issued patents and published applications. For pending or abandoned applications please consult USPTO staff.***

**Assignee Name : PATENT ENFORCEMENT COMPANY****Total Assignments: 2****Assignment: 1****Reel/Frame:** 024305/0597**Pages:** 2**Recorded:** 03/31/2010**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor**1 GAMBARO, THOMAS L.**Exec Dt:** 03/31/2010**Assignee**

1 PATENT ENFORCEMENT COMPANY  
P.O. BOX 14741  
PORTLAND, OREGON 97293-0741

**Property**

Pat #	Pub #	App #
<u>5332322</u>	NONE	08003118

**Correspondence name and address**

THOM L. GAMBARO/PATENT ENFORCEMENT CO.  
P.O. BOX 14741  
PORTLAND, OR 97293-0741

**Assignment: 2****Reel/Frame:** 024539/0876**Pages:** 3**Recorded:** 06/16/2010**Conveyance:** CORRECTIVE ASSIGNMENT TO CORRECT THE THE ASSIGNOR PREVIOUSLY RECORDED ON REEL 024305 FRAME 0597. ASSIGNOR(S) HEREBY CONFIRMS THE AN ASSIGNMENT.**Assignor**1 MOTIONLESS KEYBOARD COMPANY**Exec Dt:** 03/31/2010**Assignee**

1 PATENT ENFORCEMENT COMPANY  
P.O. BOX 14741  
PORTLAND, OREGON 97293-0741

**Property**

Pat #	Pub #	App #
<u>5332322</u>	NONE	08003118

**Correspondence name and address**

MOTIONLESS KEYBOARD COMPANY  
P.O. BOX 14741  
PORTLAND, OR 97293-0741

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### CERTIFICATE OF SERVICE

I certify that on September 17, 2010, I served or caused to be served a true and complete copy of the foregoing **DECLARATION OF FAROOQ A. TAYAB IN SUPPORT OF PLAINTIFF'S CONCISE STATEMENT OF MATERIAL FACTS IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** on the party or parties listed below as follows:

_____	Via CM / ECF Filing
✓ _____	Via First Class Mail, Postage Prepaid
_____	Via Email
_____	Via Personal Delivery

Thomas L. Gambaro  
individually and dba  
Patent Enforcement Company  
and Motionless Keyboard Company  
P.O. Box 14741  
Portland, OR 97293  
  
Defendants *Pro Se*

James M. Buchal, Esq.  
Murphy & Buchal  
2000 SW 1st Avenue, Suite 420  
Portland, OR 97201  
  
Counsel for Defendant Motionless  
Keyboard Company

**HARRANG LONG GARY RUDNICK P.C.**

By: /s/ Susan D. Marmaduke  
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Of Attorneys for Plaintiff FLIR Systems,  
Inc.

P0214743.DOC;1